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6 ROLAND HEATHINGTON

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:20-CR-0008-TLN-1
11 Plaintiff,)
12 vs.) **STIPULATION AND ORDER TO CONTINUE**
13 ROLAND HEATHINGTON,) **STATUS CONFERENCE AND EXCLUDE TIME**
14 Defendant.)
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IT IS HEREBY STIPULATED and agreed by and between United States Attorney
McGregor W. Scott, through Assistant United States Attorney Ross Pearson, counsel for
Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Jerome
Price, counsel for Defendant Roland Heathington, that the status conference currently set for
November 12, 2020 may be continued to **December 17, 2020 at 9:30 A.M.** The parties
specifically stipulate as follows:

1. By previous order, this matter was set for a status on November 12, 2020.
2. By stipulation, Mr. Heathington moves to continue the status conference to
December 17, 2020.
3. The government sent a proposed plea agreement to defense counsel on November
6, 2020 in addition to the discovery associated with this case which includes
police reports, body camera recordings, photographs, and various documents that
have either been produced to the defense or made available for inspection and

1 copying.

2 4. Defense counsel represents that they require additional time to review and
3 consider the plea offer as well as review the discovery, investigate possible
4 defenses and pretrial motions, consult with Mr. Heathington, and explore
5 potential resolutions to the case.

6 5. Defense counsel believes that failure to grant the requested continuance would
7 deny them the reasonable time necessary for effective preparation, taking into
8 account the exercise of due diligence.

9 6. The government does not object to the continuance.

10 7. Therefore, the parties stipulate that the ends of justice served by granting the
11 continuance outweighs the best interest of the public and Mr. Heathington in a
12 speedy trial, and request the Court so to find.

13 8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
14 Act), the parties request that the time period between November 12, 2020 and
15 December 17, 2020 (inclusive) be deemed excludable pursuant to 18 U.S.C. §
16 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance
17 granted by the Court at Mr. Heathington's request, based on a finding that the
18 ends of justice served by granting the continuance outweighs the best interest of
19 the public and Mr. Heathington in a speedy trial.

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Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: November 10, 2020

/s/ Jerome Price
JEROME PRICE
Assistant Federal Defender
Attorneys for Defendant
ROLAND HEATHINGTON

Date: November 10, 2020

MCGREGOR W. SCOTT
United States Attorney

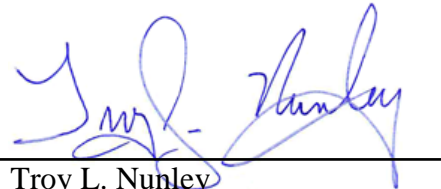
/s/ Ross Pearson
ROSS PEARSON
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: November 12, 2020


Troy L. Nunley
United States District Judge